

December 5, 2024

VIA ECF

Honorable Brian R. Martinotti, U.S.D.J.
United States District Court
District of New Jersey
U.S. Post Office & Courthouse
2 Federal Square
Newark, NJ 07102

**Re: *In re: Insulin Pricing Litigation*, MDL No. 3080
No. 2:23-md-03080-BRM-RLS**

Dear Judge Martinotti:

We write on behalf of the parties regarding the Case Management Conference scheduled for Tuesday, December 10, 2024, and to provide a biweekly update:

- ***General Discovery***. Defendants have served their Responses and Objections to Plaintiffs' First Set of Master Requests for Production.
- ***Self-Funded Payor (SFP) Track***. On Tuesday, December 3, Plaintiffs in the SFP Track circulated a proposed exemplar amended complaint that names additional defendants and adds certain allegations relating to those new defendants. Defendants are reviewing the proposed amended complaint, and the parties intend to meet and confer.
- ***State Attorney General (State AG) Track***. On Wednesday, December 4, Defendants circulated a proposed Plaintiff Fact Sheet and draft implementation order in the State AG Track for Plaintiffs' review.

The parties have conferred and do not have any agenda items for the Court to address. Unless the Court would like to discuss these or any other issues with the parties in person, we respectfully suggest that this month's conference be adjourned.

Finally, in accordance with the Court's MDL Text Order dated August 30, 2024 [ECF No. 268], the parties enclose a joint list of all pending motions in the MDL cases. A current MDL case list is also enclosed for the Court's reference.

We thank the Court for its continued attention to this matter.

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Respectfully submitted,

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s/ David R. Buchanan
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s/ Joanne Cicala
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State Attorney General Track*

s/ John D. Tortorella
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Enclosures

cc: Honorable Rukhsanah L. Singh, U.S.M.J. (via ECF)
Counsel of Record (via ECF)